

United States District Court					
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION					
CRUZ VALDIVIESO FIGUERA, <div style="text-align: center;">Plaintiffs,</div> vs. ALL VIP CARE INC. AND LIZ VELAZQUEZ MCKINNON, <div style="text-align: center;">Defendants.</div>				JOINT EXHIBIT LIST CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT	
PRESIDING JUDGE HONORABLE WILLIAM P. DIMITROULEAS		PLAINTIFF'S ATTORNEY FAIRLAW FIRM Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146		DEFENDANT'S ATTORNEY FLORIDA HEALTHCARE LAW FIRM. Randy M. Goldberg Esq., 151 NW 1 st Avenue., Delray Beach, FL 33444	
TRIAL DATE(S) October 23, 2023		COURT REPORTER		COURTROOM DEPUTY	
JOINT NO	DATE OFFERED	MARKED	OBJECTIONS	ADMITTED	Exhibit
1					All VIP Care Letter regarding Application
2					Application for Contract or Employment*
3					Independent Contractor Agreement*
4					Acknowledgement of Nurse Registry Policy & Procedure*
5					Home Health Aide/Certified Nursing Assistant Job Description
6					Affidavit of Compliance with Background Screening
7					Independent Contractor Professional Liability Policy
8					Waiver of Professional Liability Insurance
9					Time Records
10					Plaintiff's Paystubs
11					HHA Exchange Patient Calendar
12					Defendants' Response to Plaintiff's Request for Production
13					Defendant, All VIP's Answers to Plaintiff's Interrogatories
14					Defendant, Velazquez McKinnon's Answers to Plaintiff's Interrogatories

* Pending the Court's ruling on Plaintiff's Motion in Limine [ECF No. 91], Plaintiff submits that the references

to “nurse registry, “registry,” and Florida Statutes governing “Nurse Registries” in these Joint Exhibits should be redacted if the Court were to determine the references should be excluded.

Respectfully Submitted on October 17, 2023.

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